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Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TW A-325  
Washington, DC 20554

**Re: Ex Parte Notice – Improving Public Safety Communications in the 800  
MHz Band (WT Docket No. 02-55)  
UTC Support of CTIA’s Request for Extension of Time**

To the Secretary:

The purpose of this letter is to express the support of the United Telecom Council (UTC) for the Motion for Extension of Time filed by the Cellular Telecommunications & Internet Association (CTIA) on January 14, 2003. CTIA requests that the current deadline for filing additional comments in the above-referenced proceeding be extended by four weeks, to March 3, 2003, and the reply comment deadline be extended to March 18, 2003. Due to the complexity of the proposal on which it must comment, UTC supports this request fully.

As noted by the large number of commenting parties in this proceeding, and the submission of the Private Wireless Coalition/Nextel/public safety associations’ supplemental comments themselves (“PWC filing”), the above-referenced proceeding is exceedingly important. UTC has been an active participant during all stages of the proceeding and fully intends to participate in this important phase. However, the PWC filing is 150 pages long, with several appendixes, some of which are highly technical. Dozens of UTC’s critical infrastructure entity members will likely be impacted by the proposal detailed in the filing and must have time, not only to review it carefully, but also to make their positions known to UTC, so that we may file detailed and useful comments in response to it. It is nearly impossible for this process to be completed, and for UTC and its many interested members to file comments of help to the Commission, within the thirty days currently allotted in the Public Notice.

UTC also supports CTIA’s argument concerning the length of time needed by the PWC and other parties to file their supplemental comments. UTC was among the parties raising several questions that arose from the PWC’s proposal as filed on August 7, 2002, questions the PWC filing now purports to answer. UTC and its members must have sufficient time to determine whether the PWC proposals do offer reasonable solutions to the important issues we raised in earlier stages of this proceeding. Given the amount of time needed for the filing parties to offer

their solutions, it is not unreasonable for the other parties in this proceeding to have a similar length of time to respond.

UTC's members' mission-critical communications systems could be severely impacted by the multi-year, mandatory retuning program proposed in the PWC filing, along with the technological restrictions proposed after this process. UTC therefore supports CTIA's Motion for an Extension of Time, and recommends that the FCC grant an additional four weeks to comment on the PWC filing.

Respectfully submitted,

/s/ Jill M. Lyon

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